

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,
STATE OF CALIFORNIA, STATE OF
COLORADO, STATE OF ILLINOIS,
STATE OF INDIANA, STATE OF IOWA,
STATE OF MINNESOTA, STATE OF
NEBRASKA, STATE OF OREGON,
STATE OF TENNESSEE, STATE OF
TEXAS, STATE OF WASHINGTON, and
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,
SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION, LLC,
and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

**DECLARATION OF EDWARD H.
TAKASHIMA IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF MOTION TO SET
INITIAL PRETRIAL
CONFERENCE**

I, Edward H. Takashima, do hereby declare and state as follows:

1. I am an active member in good standing of the bars of the District of Columbia and the State of California. I am an attorney in the Bureau of Competition of the Federal Trade Commission ("FTC"), an agency of the United States Government, and I am representing the FTC in the above-captioned action. I have personal knowledge of the matters set forth in this declaration.

2. I respectfully submit this Declaration in support of Plaintiffs' Reply in Support of Motion to Set Initial Pretrial Conference.

3. Attached as Exhibit A is a true and correct copy of a June 24, 2022 Order issued in *M.P.T. Racing, Inc. v. Brothers Research Corp.*, No. 1:22-cv-00334-CCE-JEP (M.D.N.C.).

4. Attached as Exhibit B is a true and correct copy of a June 30, 2022 Order issued in *M.P.T. Racing, Inc. v. Brothers Research Corp.*, No. 1:22-cv-00334-CCE-JEP (M.D.N.C.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 25, 2023.

/s/ Edward H. Takashima
Edward H. Takashima